From: Polly Hewitt
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 9:27:16 PM

I am writing to oppose the draft version of OGE's proposed legal expense fund regulation. I request that OGE make these changes:

- remove the exception that makes compliance with the regulation optional;

- replace the proposed recusal requirement with a broader five-year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests;

- remove the offensive example involving an accused sexual harasser;

- and finally, place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Thank you for your consideration.

Pauline Hewitt
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